EXHIBT A

EXHIBIT "A"

DEPOSITION SUBJECT MATTER

Pursuant to Rule 30(b)(6), the deponent(s) must have knowledge and shall be able to testify concerning the following subject matters:

1. The identity of any former or current manufacturer of the TVT product or product components during the relevant time period, including details regarding dates of manufacture and components or devices produced.

2. The identity, location, storage and organization of documentation regarding clinical studies transferred or received by Defendants from Medscand Medical, Cooper Surgical Inc., or any other previous manufacturer or distributor of TVT.

3. The decision of whether or not to store or destroy the documentation and actual TVT products and/or exemplars shipped to defendant by Medscand Medical, Cooper Surgical Inc., or any other previous manufacturer or distributor of TVT.

4. The identity, location, storage and organization of documentation regarding shelf life studies transferred or received by Defendants from Medscand Medical, Cooper Surgical Inc., or any other previous manufacturer or distributor of TVT.

5. The identity, location, storage and organization of documentation regarding batch history records transferred or received by Defendants from Medscand Medical, Cooper Surgical Inc., or any other previous manufacturer or distributor of TVT.

6. The identity, location, storage and organization of actual TVT product retains held by Defendants or their representatives as well as documentation regarding such product retains transferred or received by Defendants from Medscand Medical, Cooper Surgical Inc, or any other previous manufacturer or distributor of TVT.